

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

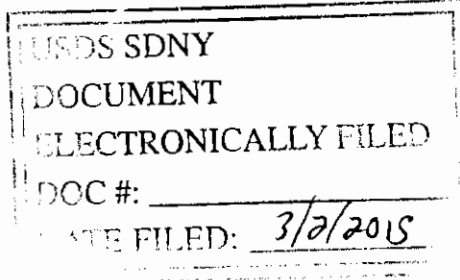
APPLE MORTGAGE CORP.,

Plaintiff,

- against -

RICHARD BARENBLATT, *et al.*,

Defendants.



13 Civ. 9233 (JGK)

**STIPULATION AND
[PROPOSED] ORDER**

(Fed. R. Evid. 502(d))

WHEREAS third party GuardHill Financial Corp. ("GuardHill") is producing certain documents, emails, and other electronically stored information ("ESI") to the parties in this litigation; and

WHEREAS the parties wish to protect against inadvertent disclosure of privileged materials.

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties and GuardHill that:

1. The production of privileged or work-product protected documents, information, emails, or other ESI, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, information, emails, or other ESI (including metadata) for relevance, responsiveness, and/or segregation of privileged and/or protected information before production.

Dated: New York, New York
February 17, 2015

BERGER & WEBB, LLP

By: *Jonathan Rogin* *with permission* *SSBB*

Jonathan Rogin
7 Times Square, 27th Floor
New York, New York 10036
(212) 319-1900
jrogin@bergerwebb.com
Attorneys for Plaintiff

SATTERLEE STEPHENS BURKE
& BURKE LLP

By: *R.C. Schoenstein*

Richard C. Schoenstein
230 Park Avenue
New York, New York 10169
(212) 404-8707
rschoenstein@ssbb.com
Attorneys for Defendants

PROSKAUER ROSE LLP

By: *AB*

Allan S. Bloom
Eleven Times Square
New York, New York 10036
(212) 969-3000
abloom@proskauer.com

Attorneys for Third Party
GUARDHILL FINANCIAL CORP.

SO ORDERED.

John G. Koeltl
JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
February 17, 2015
3/1/15